

**SEMENZA KIRCHER RICKARD**

Jarrold L. Rickard, Bar No. 10203  
jlr@skrlawyers.com  
Katie L. Cannata, Bar No. 14848  
klc@skrlawyers.com  
10161 Park Run Drive, Suite 150  
Las Vegas, Nevada 89145  
Telephone: (702) 835-6803  
Facsimile: (702) 920-8669

**LEVINE KELLOGG LEHMAN  
SCHNEIDER + GROSSMAN LLP**

Jeffrey C. Schneider, Esq.  
jcs@lklsg.com  
Jason K. Kellogg, Esq.  
jk@lklsg.com  
Marcelo Diaz-Cortes, Esq.  
md@lklsg.com  
100 SE 2nd Street  
Miami Tower, 36th Floor  
Miami, Florida 33131  
Telephone: (305) 403-8788  
Facsimile: (305) 403-8789

[Additional counsel on signature page]

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

*In re J&J Investment Litigation*

Case No.: 2:22-cv-00529-GMN-NJK

GEOFF WINKLER, as court-appointed  
receiver for J&J Consulting Services, Inc., an  
Alaska corporation; J&J Consulting Services,  
Inc., a Nevada corporation; and J and J  
Purchasing LLC, Florida limited liability  
company,

Case No.: 2:23-cv-00703-GMN-NJK

**JOINT REQUEST TO EXTEND STAY**

Plaintiff,

v.

WELLS FARGO BANK, N.A.,

Defendant.

1 On August 15, 2023, pursuant to the parties' request, the Court stayed these cases pending  
2 mediation. ECF No. 47. The Court ordered that "the parties must file either a status report or  
3 request to extend the stay no later than Tuesday, October 31, 2023[.]" *Id.* Pursuant to that order  
4 and a nearly identical one issued in *In re J&J Investment Litigation*, No. 2:22-cv-00529-GMN-  
5 NJK (D. Nev.) (the "Class Action"), the parties timely submitted in the Class Action a Joint  
6 Request to Extend Stay, which the Court granted. Class Action, ECF No. 130–32.

7 The parties, however, did not submit the Joint Request in this action by October 31, as they  
8 were under the mistaken impression that their filing in the Class Action would be considered for  
9 purposes of both actions and any resulting stay would similarly apply to both actions. On  
10 November 15, 2023, the Court entered an Order in this action requiring the parties to submit a  
11 joint proposed discovery plan by November 20, 2023, noting that the parties did not comply with  
12 the August 15 Order. ECF No. 48. The parties ask the Court to excuse their oversight of not filing  
13 the Joint Request in this action and request that, due to the parties' ongoing mediation efforts and  
14 the interrelatedness of this action and the Class Action, the Court consider and apply the Joint  
15 Request to Extend Stay to this action. The parties, including Class Plaintiffs, the Receiver, and  
16 Wells Fargo, continue to be engaged in mediation discussions with Robert A. Meyer, Esq., of  
17 JAMS. Although the parties did not reach a settlement, with the assistance of the mediator the  
18 parties have identified a path forward for future productive discussions.

19 The protocol that the parties negotiated provides for an exchange of specified information  
20 by January 16, 2024, and a meeting between the parties' accountants over a period of days. After  
21 that, the parties are scheduled to mediate again with Mr. Meyer on February 29, 2024.

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The parties accordingly request that both the Receiver's case and the class action remain stayed through the date of the February mediation. The parties further propose to submit either a status report or request to extend the stay no later than March 7, 2024. If the parties do not request to extend the stay, the parties propose to file a proposed case schedule by March 14, 2024.

Dated: November 16, 2023

Respectfully submitted,

**SEMENZA KIRCHER RICKARD**

By: /s/ K. Issac deVyver

/s/ Jarrod L. Rickard

Jarrod L. Rickard, Bar No. 10203  
Katie L. Cannata, Bar No. 14848  
10161 Park Run Drive, Suite 150  
Las Vegas, Nevada 89145

K. Issac deVyver (*pro hac vice*)  
Alicia A. Baiardo (*pro hac vice*)  
Anthony Q. Le (*pro hac vice*)  
**MCGUIREWOODS**  
1800 Century Park East, 8th Floor  
Los Angeles, CA 90067  
Phone: 310.315.8200  
Fax: 310.315.8210  
KdeVyver@mcguirewoods.com  
ABaiardo@mcguirewoods.com  
ALe@mcguirewoods.com

/s/ Jason K. Kellogg

**LEVINE KELLOGG LEHMAN  
SCHNEIDER + GROSSMAN LLP**

Jeffrey C. Schneider, P.A.  
Florida Bar No. 933244  
(admitted *pro hac vice*)  
Jason K. Kellogg, P.A.  
Florida Bar No. 0578401  
(admitted *pro hac vice*)  
Marcelo Diaz-Cortes, Esq.  
Florida Bar No. 118166  
(admitted *pro hac vice*)  
100 SE 2nd Street  
Miami Tower, 36th Floor  
Miami, Florida 33131


Joseph G. Went (NBN 9220)  
Sydney R. Gambee (NBN 14201)  
**HOLLAND & HART LLP**  
9555 Hillwood Drive, 2nd Floor  
Las Vegas, NV 89134  
Phone: 702.669.4600  
Fax: 702.669.4650  
jgwent@hollandhart.com  
srgambee@hollandhart.com

*Attorneys for Plaintiff*

*Attorneys for Defendant*

IT IS SO ORDERED.

Dated this 17 day of November, 2023.

  
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Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT